

# W5YI

## America's Oldest Ham Radio Newsletter REPORT

Up to the minute news from the world of amateur radio, personal computing and emerging electronics. While no guarantee is made, information is from sources we believe to be reliable.

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## Comments Pouring in on Amateur Radio Restructuring!

*Is Morse code needed? And if so, at what proficiency speeds. Amateurs are telling the FCC!*

The hot subject in ham radio continues to be the FCC's proposal to restructure the Amateur Service. On August 10, the Federal Communications Commission released a lengthy *Notice of Proposed Rulemaking* which looked toward remodeling the Amateur Service. The proceeding is part of the FCC's 1998 Biennial Review of regulations which no longer serve the public interest.

In the NPRM, the Commission proposed to reduce the number of Amateur license classes from six to four, permit the Advanced Class to act as Volunteer Examiners for the General Class, eliminate RACES (Radio Amateur Civil Emergency Service) licenses. They also asked for input on ideas to improve the Amateur Service enforcement process and possible changes to the Morse code and written examination requirements.

The FCC proposed four license classes (Technician, General, Advanced and Extra Class) which, in a July 22<sup>nd</sup> letter to the Commission, the *American Radio Relay League* agreed with. The ARRL initially wanted the classes called Class A, B, C and D, however. The League, later (on October 24<sup>th</sup>) reverted back to Technician, General, Advanced and Extra.

Keep in mind that the ARRL proposal to the FCC was made three weeks before the FCC released their restructuring version. The League further proposed that the code speeds should be reduced to 5 WPM for the General and 12 WPM for

the Advanced and Amateur Extra Class -- down from 13 and 20 WPM.

Like the FCC, the ARRL suggested that the Novice and Tech Plus Classes be abolished with the General Class becoming the HF entry. The NPRM had a comment filing date of December 1 with reply comments by January 15<sup>th</sup>.

In their 35-page comments to the FCC, the Volunteer Examiner Coordinators suggested that the proper number of Amateur Service classes should be three, Technician (no code), General (5 WPM) and Extra Class (also 5 WPM.)

So there were three major proposals on the table, that of the

FCC: Four license classes — but no change in the Morse requirements. The 5 WPM examination would remain, however, and Technician Class operators who passed it would be able to use what was the Novice bands. The General Class would require 13 WPM, Extra Class: 20 WPM.

ARRL: Four license classes — With General requiring 5 WPM, and Advanced/Extra: 12 WPM. At their October 24<sup>th</sup> Board meeting, the ARRL directors further agreed that Technician Class operators should be permitted to operate CW in the General Class band without prior testing. This was more or less a bombshell position since no other country in the world permits high frequency CW operation

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without prior examination. The ARRL's rationale was that if a person could carry on a CW QSO, then the operator was qualified since the international requirement of having to prove Morse proficiency in order to operate below 30 MHz had been met. ARRL suggested 35 question written exams for the Technician and General Class, 40 for the Advanced and 50 for Extra.

VEC: Three license classes, Technician, General and Amateur Extra Class. A top speed of 5 WPM also would mean that VEs no longer would face the problems associated with issuing waivers of the higher code speeds to the handicapped. The Advanced Class would be combined with Amateur Extra. The VECs proposed 50 question written examinations for the Technician and General Class ...and 100 for the Extra.

## Comments from the Amateur Community

Comments started pouring into the FCC almost immediately! At this writing, close to 1000 have been filed and have now been posted to the Commission's *Electronic Comment Filing System* (ECFS). We have to admit, however, that it has been somewhat difficult searching the ECFS, since the FCC keeps reprogramming, adjusting and refining it in real time. Some comments disappear and reappear later ...and there are several duplicate comments posted. For some unknown reason, some of the longer comments can't be accessed at all even though they are shown in the index.

The FCC is apparently also adding in comments to the ECFS that were e-mailed (rather than keyed in or file downloaded to the World Wide Web) and scanning in those that were mailed to the FCC in Washington, DC. Presumably the objective is to have all comments available to the public. We strongly suggest that you also read them. Here is how to do it:

- 1.) Point your browser to the following Web address: <<http://www.fcc.gov/e-file/ecfs.html>>
- 2.) Click your mouse on the link: **Search the ECFS** — You will be transported over a secure connection to:
- 3.) A screen which will ask you to enter "fill in the blank" items. You need to only fill in the (first) **Proceeding** blank with the following numbers: **98-143**
- 4.) Then mouse click on the **Retrieve Document List** button at the bottom of the screen.
- 5.) An index will appear indicating the number of comments on that proceeding in the ECFS. (Such as: **978 Record(s) Found; 973 Contain Document(s)**)
- 6.) Click on the **Comment** button to read the sender's views.
- 7.) The comments are in **PDF format** which means you need to have the Adobe Acrobat Reader 3.01 software on your system.
- 8.) This is a free program which can be downloaded from <<http://www.adobe.com/>> (Click on the little

yellow button at the bottom left of the first screen.) You will have to unzip the program and install it.

## Morse code in the Amateur Service

We have been keeping track of the comments on the Morse code issue (which is by far the most contentious issue) and the results are totally predictable.

- 1.) Most Extra Class amateurs oppose any change in the code requirements... probably since they have already passed 20 WPM.
- 2.) Most General and Advanced Class amateurs favor the ARRL plan which proposes a maximum 12 WPM code speed. (They have already passed 13 WPM and won't have to take any more code exams.)
- 3.) Tech Plus and Technician licensed amateurs overwhelmingly favor the VEC proposal which provides for a maximum 5 WPM code speed. Again predictable. If code testing is to be required by international law, then the slowest speed is the fastest wanted.
- 4.) In total, however, most amateurs favor the VEC proposal. This is undoubtedly because more comments (nearly 60%) are being filed by the newer (no/slow code) operators than the longer licensed fast code (that is, the 13 and 20 WPM proficient.)
- 5.) Very few Novice operators are filing an opinion.

Table No. 1 - **COMMENTS BY CODE PROFICIENCY**

| Telegraphy<br>Proposal | Fast<br>Code (4) | No/slow<br>Code (5) | Proficiency<br>Unknown (6) | All  |
|------------------------|------------------|---------------------|----------------------------|------|
| FCC (1)                | 42%              | 6%                  | 19%                        | 23%  |
| ARRL (2)               | 30%              | 25%                 | 23%                        | 27%  |
| VEC (3)                | 27%              | 70%                 | 57%                        | 50%  |
| TOTAL                  | 100%             | 100%                | 100%                       | 100% |

(1) = Favors no change in present telegraphy requirements

(2) = Favors 5 WPM General, 12 WPM for Advanced and Extra

(3) = Favors maximum speed of 5 WPM for all classes

(4) = Fast code licensee = General/Advanced/Extra Class

(5.) = No/Slow code licensee = Novice/Technician/Tech Plus

(6.) = Unknown proficiency = Unable to determine class

**NOTE:** This chart was prepared by feeding code preferences and license class of all commenters into an Excel spread sheet. All comments were extracted from the FCC's *Electronic Comment Filing System* (ECFS) which is publicly available on the Internet.

Table No. 1 relates the license held by an amateur (either fast code: 13/20 WPM, or no/slow code: 0/5 WPM) to how he/she commented to the FCC. Note that the fast coders prefer either no change or a maximum of 12 WPM, while the no/slow coders prefer a maximum of 5 WPM.

Overall, when all comments are considered, however, half of all respondents prefer a 5 WPM maximum code speed. It clearly shows that comments from the amateur community reflect their own personal situation. Interestingly, 77% of all comments filed favor 5 WPM or less code speed for the General Class.

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Table 2 is based on 616 comments listed on the FCC's Electronic Comment Filing System. It relates the number of comments filed to the commenter's license class:

Table No. 2 - Code preference related to license class

| Code     | License Class |    |    |     |     |   |    |       |
|----------|---------------|----|----|-----|-----|---|----|-------|
| Proposal | E             | A  | G  | P   | T   | N | U  | Total |
| 5/13/20  | 72            | 20 | 20 | 8   | 9   | 1 | 9  | 139   |
| 5/12/12  | 30            | 36 | 14 | 53  | 20  | 2 | 11 | 166   |
| 5/5/5    | 30            | 31 | 11 | 132 | 80  | 0 | 27 | 311   |
|          | 132           | 87 | 45 | 193 | 109 | 3 | 47 | 616   |

Note that most Extra class amateurs do not favor any change in the code speed ...while the Technician and Tech Plus amateur favors a code speed no higher than 5 WPM. (U=Unknown license class.)

### AMATEUR SERVICE RESTRUCTURING COMMENTS

Hundreds of comments have already been filed electronically through the FCC's Electronic Comment Filing System (ECFS). (We are not really sure just how many, since the online program keeps changing!)

To determine what the Amateur community is saying about the Morse code, we randomly download approximately 10% of those posted. In our October 1<sup>st</sup> newsletter, we gave you a sample of the September comments. Here is a cross section of the comments received by the FCC during October. Remember, this is NOT a scientific survey, just a random sampling:

■ I was licensed as a Technician Class amateur radio operator with the call sign of KC4YAU on March 26, 1991. ...In 1991, the Commission took the first step in moving the amateur radio service into the 21st century with the creation of the "no-code" license. Now, with the new century just over a year away, it's time for the Commission to take a second step.

Specifically, I would like to speak in favor of eliminating the current requirement that amateur radio operators must demonstrate mastery of Morse code before being granted high frequency privileges in the amateur radio bands. ...

Let me make it clear, I do not oppose the continued use of Morse code on the amateur bands, only the code testing requirement. If the code requirement were abolished, I personally would use Morse code. However, instead of using a key I would use a computer to send and receive.

Computers are already used in the Amateur Radio Service to transmit data by Packet and RTTY mode... I believe if the code requirement were abolished you would find many amateur radio operators like myself who would use code, albeit through computers. [Clay Redden, KC4YAU]

■ I am a practicing attorney in the State of Wisconsin. ...In 1982, I was the founder of the Watertown Amateur Radio Club which at that time had about 25 active members. ...Today our club only has about 14 active members and the average age is about 50.

Some of the former members and many potential new young members have opted to use the Internet instead of Amateur Radio to communicate with others around the world.

...Most potential amateurs already have a computer in the home, so the Internet is an easier way to communicate. We need to encourage these individuals to enter Amateur Radio and the no code Technician license has been a great start.

I believe the major reason that we are not seeing more General, Advanced and Extra Class upgrades is the Morse code requirement. It takes a lot of work to master 13 or 20 WPM. Personally, I have never been able to devote the time to master 20 WPM for the Extra Class.

This past year I encouraged my wife to obtain a Technician license. She is now N9ELL. When she passed the test, I suggested that she go for General. She bought the study manual, and started learning the code. She was practicing at 5 WPM, but when she realized how difficult 13 WPM would be, she gave up.

Another thing I learned helping my wife with the Technician questions is that the question pool should include fewer technical theory questions and more practical operating questions. ...The entry class license should concentrate on making a competent new operator. Lower the Morse code requirement to 5 WPM for all HF privileges. Make the Technician class ... more practical and less theoretical. ...Combine the Advanced and Extra Class licenses into a single class... [Claude C. Held II, WA9KCU]

■ I strongly believe that the CE portions of all HF/VHF/UHF bands be relisted as both CW and phone in each class [which will] afford greater bandwidth to all as phone doesn't much hurt CW... [Albert Redles, N3JCD]

■ I think the Morse code should be considered like many of the other modes. The testing should be about Morse, such as "What does the Morse character • — (didah) stand for?" That is the way the other modes are handled. But because of the International Radio Regulations, I would say that a Morse code test of 5 wpm for the General Class license would be acceptable. This test would be either multiple choice or one minute of 'understandable' copy. There would be no other speed tests required for the other license classes. In place of Morse code, there should be more emphasis on technology. [Michael J. Metzdorf, KB9NZV]

■ I believe that manual transmission and reception of telegraphy is an anachronism — similar to a slide rule. Engineering schools no longer teach operation of a slide rule as it is irrelevant in today's scientific environment.

I propose that the FCC reduce the code requirement to 5 WPM for all classes of amateur license. [Jim Phillips, KB6OKH]

■ Amateur radio is rapidly becoming extinct as new forms of communications are being developed. It is important to keep the hobby alive by letting people have access to this great pastime. [Irwin S. Goldstein, Niles, IL]

■ The Morse code should be standardized to include 5 minutes of copy and a passing grade of one minute of understandable copy, not perfect copy. This is real world Morse code communication between stations... [Delwyn W.M. Ching, Honolulu, HI]

■ I teach Amateur Radio at my high school and it concerns me that the written test is now harder than it has ever been before. ...Combining the Novice and Technician pools for a total number of almost 1,000 questions in the question pool will

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## Volunteer Examiner Coordinator Report - 1995 through September 1998 \*

Report indicates number of examination sessions, persons examined, total elements administered and average session size for the last four years. Note that the only two months with an increase in the number of applicants and exam elements administered was May and June 1997. (Shown in **bold** below.) This is because a new Element 2 (Novice) and Element 3A (Technician) question pool went into effect on July 1, 1997. After July 1, the number of applicants and exam elements are greatly reduced. There are about 30% less persons taking ham radio examinations than just two years ago. Not a good trend at all!

| Month  | SESSIONS |        |         |       | PERSONS |         |             |        | ELEMENTS |         |              |        | SESSION SIZE |    |    |    |
|--------|----------|--------|---------|-------|---------|---------|-------------|--------|----------|---------|--------------|--------|--------------|----|----|----|
|        | 1995     | 1996   | 1997    | 1998  | 1995    | 1996    | 1997        | 1998   | 1995     | 1996    | 1997         | 1998   | 95           | 96 | 97 | 98 |
| Jan.   | 942      | 845    | 812     | 738   | 8330    | 6228    | 5331        | 4102   | 14355    | 10353   | 8999         | 6772   | 9            | 7  | 7  | 6  |
| Feb.   | 951      | 882    | 921     | 780   | 9516    | 7231    | 7154        | 5473   | 16230    | 12355   | 12087        | 9036   | 10           | 8  | 8  | 7  |
| March  | 1067     | 1084   | 1035    | 886   | 11050   | 10196   | 8885        | 6537   | 18726    | 17245   | 14798        | 10829  | 10           | 9  | 9  | 7  |
| April  | 1080     | 1088   | 1082    | 888   | 10895   | 9671    | 9284        | 5998   | 17896    | 16618   | 15714        | 10154  | 10           | 9  | 9  | 7  |
| May    | 1089     | 971    | 992     | 863   | 10043   | 7557    | <b>7910</b> | 5848   | 16985    | 12666   | <b>13297</b> | 9660   | 9            | 8  | 8  | 7  |
| June   | 977      | 914    | 1165    | 850   | 8045    | 6748    | <b>9314</b> | 5360   | 13563    | 11266   | <b>15215</b> | 8834   | 8            | 7  | 8  | 6  |
| July   | 837      | 755    | 617     | 587   | 6526    | 5155    | 3172        | 3352   | 11086    | 8710    | 5087         | 5533   | 8            | 7  | 5  | 6  |
| Aug.   | 821      | 819    | 696     | 662   | 6533    | 5674    | 4077        | 3891   | 11085    | 9435    | 6536         | 6602   | 8            | 7  | 6  | 6  |
| Sept.  | 921      | 848    | 731     | 676   | 6498    | 5181    | 3700        | 3590   | 11096    | 8844    | 6078         | 5779   | 7            | 6  | 5  | 5  |
| Oct.   | 840      | 847    | 736     |       | 6398    | 5271    | 4077        |        | 10930    | 8892    | 6673         |        | 8            | 6  | 6  |    |
| Nov.   | 889      | 880    | 803     |       | 6986    | 6156    | 4782        |        | 12007    | 10510   | 7964         |        | 8            | 7  | 6  |    |
| Dec.   | 845      | 791    | 747     |       | 6726    | 5323    | 4289        |        | 11370    | 9053    | 7176         |        | 8            | 7  | 6  |    |
| Total: | 11260    | 10724  | 10337   | *6930 | 97547   | 80391   | 71975       | *44151 | 165330   | 135945  | 119624       | *73199 | 8            | 7  | 7  |    |
|        | (4.8%)   | (3.6%) | (13.9%) |       | (17.5%) | (10.5%) | (25.0%)     |        | (17.8%)  | (18.2%) | (25.2%)      |        |              |    |    |    |

We update this report about once every six months. Year-to-date: 44151 persons were examined at VEC sessions this year versus 77436 in 1995 - **a 43% decline**. (And 44% less examination elements were administered than in 1995.) If the trend continues, there will be 25% less people being examined for ham tickets in 1998 versus 1997.

## Examinations Administered Under VEC System by Year - 1984 through Sept. 1998\*

| Date  | Sessions | % Inc.  | Persons | % Inc.  | Elements | % Inc.  | Pass Rate |
|-------|----------|---------|---------|---------|----------|---------|-----------|
| 1984  | 413      |         | 8599    |         | 12633    |         | 47.5%     |
| 1985  | 3223     | 680.4%  | 41439   | 381.9%  | 62589    | 395.4%  | 58.2%     |
| 1986  | 3784     | 17.4%   | 42422   | 2.4%    | 61921    | (1.1)%  | 59.7%     |
| 1987  | 4378     | 15.7%   | 49728   | 17.2%   | 81042    | 30.9%   | 60.6%     |
| 1988  | 4903     | 12.0%   | 53546   | 7.7%    | 89788    | 10.8%   | 61.0%     |
| 1989  | 5486     | 11.9%   | 57417   | 7.2%    | 96092    | 7.0%    | 61.5%     |
| 1990  | 6250     | 13.9%   | 64737   | 12.7%   | 105763   | 10.1%   | 60.8%     |
| 1991  | 8118     | 29.9%   | 103251  | 59.5%   | 172061   | 62.7%   | 66.2%     |
| 1992  | 10016    | 23.4%   | 115852  | 12.2%   | 193521   | 12.5%   | 65.6%     |
| 1993  | 10848    | 8.3%    | 113028  | (2.4)%  | 193911   | 0.2%    | 65.0%     |
| 1994  | 11638    | 7.3%    | 106670  | (5.6)%  | 194584   | 0.3%    | 65.2%     |
| 1995  | 11260    | (3.2)%  | 97547   | (8.6)%  | 165330   | (15.0)% | 55.2%     |
| 1996  | 10724    | (4.8)%  | 80391   | (17.6)% | 135945   | (17.8)% | 55.0%     |
| 1997  | 10337    | (3.6)%  | 71975   | (10.5)% | 119624   | (12.0)% | 53.1%     |
| 1998  | *6930    | (13.9)% | *44151  | (25.0)% | *73199   | (25.2)% | 57.7%     |
| Total | 108308   |         | 1050753 |         | 1758003  |         | 60.3%     |

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■ **THE VICTORIAN INTERNET** by Tom Standage is a new book subtitled "The Remarkable Story of the Telegraph and the Nineteenth Century's On-Line Pioneers." It is the story of the invention and refinement of the telegraph which was once cutting-edge technology, every bit as hot, Standage reminds us, as today's Internet.

"During Queen Victoria's reign a new communications technology was developed that allowed people to communicate almost instantly across great distances, in effect shrinking the world faster and further than ever before." The time of the telegraph lasted approximately a century. The invention of the telephone was the most important harbinger of its decline, but it lasted well into the late 20th century. Then came the fax machine and e-mail. Its history reminds us that the progress of technology is relentless, and suggests that the Internet, too, will have a finite lifetime. (224 pages. "Amazon.com" discounts the \$22.00 book 40% to \$13.20)

■ **I'm sure you have all received e-mail messages warning you of dire consequences if you read an e-mail** whose subject is "WIN A HOLIDAY," "JOIN THE CREW," "GOOD NEWS!" "AOL4FREE" or something like that.

These e-mail messages are a hoax and the false warning of a malicious e-mail does not exist. There is currently no virus that has the characteristic described in the message. These are hoaxes intended to damage free communication by making people afraid to use e-mail. It is not possible to get a virus by just reading a message, unless the e-mail contains a macro or attachment that you then execute. By far the most common source of a virus infection is downloaded software. A public bulletin board (BBS) is probably the easiest place to plant a virus.

■ **If you can't beat 'em, join 'em department!** Both MCI and AT&T are competing with them self by hiding their ownership of Telecom USA and the Lucky Dog Phone Company! Both offer discount priced "dial around" service. By dialing the extra seven-digit code, consumers bypass their regular long distance carrier and get cheaper rates. It is a \$2 billion market which will grow to \$3 next year. MCI offers 10-10-321 and 10-10-220, AT&T: 10-10-345. You won't find AT&T mentioned at: <<http://www.luckydog.com>> Now comes word that Sprint is about to join the "flanker brand" fray. Watch for its 10-10-777 ads.

■ **Effective February 1, 1999 large cargo ships - and all passenger ships - were supposed to have GMDSS equipment up and running.** But it is not going to happen. GMDSS, the *Global Maritime Distress and Safety System*, uses satellites and DSC (Digital Selective Calling) instead of CW for emergency calls.

The U.S. Coast Guard will not have DSC operative for some time so VHF-FM Channel 16 (156.8 MHz) and 2182 kHz SSB will continue to be used. Radio operators on deep sea ships say Channel 16 now sounds like CB and unusable near the shoreline since the FCC no longer requires small personal vessels to have ship radio licenses. Emergency position-indicating radio beacons (EPIRBs) which send distress messages to orbiting satellites are apparently easily tripped and the false alarm rate is said to be 99% meaning one distress call in a hundred is legitimate!

■ **"Per-minute Internet fees are NOT on the way"** says FCC Chairman Bill Kennard. His comment responds to a joint filing by the *Consumers Union* and the *Consumer Federation of America* which contend that people could one day end up paying per-minute charges for Internet use if the commission decides to treat calls to the Internet as interstate communications. "The FCC has no intention of repealing an existing provision that exempts Internet service providers, such as America Online, from paying per-minute charges to local telephone companies."

■ **The FCC's Compliance and Information Bureau has shut down four HF pirate radio stations.** CIB Chief Richard D. Lee said the four high frequency unauthorized radio broadcasting stations were located in Tewksbury, MA; Glendale Heights, IL; Katy, TX and Sierra Madre, CA. The subjects, whose names are being withheld pending further official action, were all operating on 6955 kHz in the HF (shortwave) band.

The FCC's Columbia Operations Center coordinated and provided information to FCC agents from the Boston, Chicago, Houston and Los Angeles offices who then performed on-site visits to the stations.

Except for certain low powered "Part 15", shortwave high frequency broadcast stations must be FCC licensed. The Commission said, "In general, unlicensed radio transmissions create a danger of interference to important authorized radio communications services. The equipment used in illegal operations is usually of unknown technical quality and its operation can

cause interference to the reception of authorized services."

Under the *Communications Act*, violators may be subject to penalties up to \$11,000 and the equipment subject to seizure and forfeiture by court order. Unlicensed operators also could be subject to criminal fines of up to \$100,000 and/or imprisonment for up to one year, or both, for a first time offense.

■ **A Georgia electronics engineer has been charged in federal court with four counts of intentionally interfering with airborne communications.** The case was based on information from the FAA that there was a sporadic and momentary radio interference problem between aircraft and air traffic controllers in northern Georgia.

After executing a federal search warrant and seizing evidence, the FBI arrested Kevin M. Kelly, of Cumming, Georgia at his home on November 6, 1998.

Extensive FCC investigation resulted in identifying the vicinity of the RF interference as coming from the Hyde Park subdivision in Cumming, GA. Kelly, a highly experienced electronics design engineer, had been extremely upset with the amount of noise originating from air traffic that flew over his residence at an altitude of approximately 15,000 feet.

A criminal complaint was filed in federal court charging Kelly with knowingly interfering with air navigation. Kelly was arraigned before a U.S. magistrate in Atlanta on November 9.

■ **Radio amateur fined \$7,500 for malicious interference** — The FCC's Philadelphia field office has issued a *Notice of Apparent Liability for Forfeiture* (NAL) in the amount of \$7,500 to James C. Thompson of Waretown, NJ for the willful jamming of a 40 meter amateur radio network.

The FCC's *Complaint and Information Bureau* (CIB) investigated a complaint filed by the *Association of North American Radio Clubs*. ANARC, which holds Net operations each Sunday morning at about 10:00 AM, had reported that someone was "jamming" the frequency by playing music along with other broadcast programs and audio sound effects deliberately each time members attempted to conduct Net operations.

On the morning of October 18, 1998, using High Frequency Direction Finding (HFDF) bearings taken by the FCC's Columbia, Maryland Monitoring

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facility and close in Mobile Automatic Direction Finding, FCC field Agents were led to the amateur radio station licensed as KA2YBP. The licensee, James C. Thompson, retransmitted programs from a Standard Broadcast station operating on 1450 KHz to the ANARC 7.240 MHz net frequency causing severe interference.

An inspection of station KA2YBP by FCC agents at about 10:05 AM, disclosed an operating Standard Broadcast radio receiver sitting next to the station's microphone and tuned to 1450 KHz.

On October 21, 1998, a *Notice of Violation* was issued to Thompson, for violation of Section 97.101(d) "willful" interference, Section 97.113(e) the retransmission of Broadcast station programs and Section 97.119(a) failure to give station identification.

In his reply, Mr Thompson stated that he did in fact violate all Rules sections as indicated. He was ordered to pay the \$7,500 fine by December 9<sup>th</sup> or file a written response showing why the forfeiture should be reduced or not imposed.

**■ Personal ham station call signs are extremely popular!** According to the FCC, more than 36,000 "Vanity" Amateur Radio station call signs have now been issued to ham operators. That's estimated to be about 10% of the active amateur population. During October 1998, 230 paper applications and 1181 electronically filed (EF) applications were received. The total paper document versus electronically filed "vanity" call signs is now about equal ... 17,991 paper and 18,260 EF.

**■ Guatemala City, Nov. 7 -- Marco Tilio Gudiel, TG9AGD, president of the Club de Radio Aficionados De Guatemala has issued an urgent appeal** to the worldwide Amateur community. He said "...that, for some unknown reason and, perhaps, for lack of accurate information, there is the impression that our beloved country, Guatemala, has not received much damage and is not in need of any international assistance. This is not so, on the contrary, we are desperately in need of your help."

The number of deaths accounted to date is very deceiving and inaccurate since most casualties took place in remote areas. "Hurricane Mitch did not hurt our capital city nearly as bad as in the coastal and interior areas where eight million -- 80% of our people -- live."

Marco said that people there have been swept away into the sea, or remain still buried under tons of debris, mountain

slides and, possibly, will never be found, nor rescued ... or taken into consideration in statistics. "We fear that the actual number of deaths will equal those reported for HR/Honduras and/or YN/Nicaragua but will never be known."

One week after Hurricane Mitch, "we still have hundreds of people on top of trees and house roofs, and we do not have enough helicopters to reach them and get them to safety. We have many reports of these people having been bitten and killed in a matter of minutes by deadly snakes who had also taken refuge on the same trees."

"One of our Club members, Boris TG7APQ has been hospitalized with a serious nervous depression because, last Tuesday, during the night, in the refugee home where he is operating his emergency rig, three children died in his arms, because of diarrhea and for lack of much needed pills which are not available."

"Coffee is our most important export and hard currency contributor and November is the date in which it ripens and has to be handpicked. Most of the crop is rotting under water. Bananas, another important export has all fruit producing trees underwater with no possibility of recovery and thousands of laborers will find themselves out of a job. Fruits and vegetables are in the same situation."

"Cattle growing areas report over 40,000 animals drowned ... 68 road bridges have fallen ... 80% of our highways are unpassable because of landslides that still are happening because of the heavy rains. The country is on its knees."

Marco says Guatemala needs helicopters (loan from U.S. Army?), medicines, food, drinking water, clothing... but not money. "Shipments can be made to the Club de Radioaficionados de Guatemala for delivery to the National Council for Reduction of Disasters who, in turn, will airlift to the proper locations. We can be contacted on the 20-meter band at 14,153.5 kHz, and 7,153.5 on the 40 meter band. Also through SIRA's E-mail at: <sira@iscnet.net> SIRA's President Rafael M. Estevez, WA4ZZG and SIRA's own station, WB4ESB are authorized to receive and send down to Guatemala all possible assistance collected."

**■ The ARRL has petitioned the FCC to create two low-frequency all-mode Amateur Radio allocations** at 136 kHz (2200 meters) and at 160 kHz (1700 meters.) "These allocations will permit experimentation with equipment, antennas,

and propagation phenomena in a small segment of the radio spectrum that has not been available to the Amateur Service for many years," the League's petition declared. The petition was filed Oct. 22.

Specifically, the League has proposed permitting CW, SSB, RTTY/data, and image emissions for amateurs in a 2.1-kHz "sliver band" from 135.7 to 137.8 kHz and in a 30-kHz segment from 160 to 190 kHz. The 135.7 to 137.8 kHz band adheres to the European Conference of Postal and Telecommunications Administrations (CEPT) band plan.

FCC rules already permit one watt 160-190 kHz unlicensed Part 15 operation but with severe antenna restrictions. The League pointed out that several other countries now permit LF operation by the Amateur Service.

The ARRL has proposed allowing a transmitter output in both LF segments of 200 W PEP, but in no case greater than 2 W EIRP (effective isotropic radiated power). The League's petition points out that poor antenna efficiencies and ground-loss characteristics likely would keep EIRPs at less than 1 W. The two bands would be available to General and higher licensees.

Hams would be secondary to the Fixed and Maritime Mobile services in the 136-kHz allocation, and secondary to the Fixed Service in the 160-190 kHz band. The League said its engineering surveys suggest that hams could operate in the two segments without causing problems to power line carrier (PLC) systems already active in that vicinity or to government assignments. Unallocated, Part 15 PLC systems are used by electric utilities to send control signals, data and voice. A copy of the petition is available on the ARRL Website at <<http://www.arrl.org>>

**■ Over 160 Amateur Radio operators from around the world attended the 16th AMSAT Annual Meeting and Space Symposium** in Vicksburg, MS. Bill Tynan, W3XO, formally stepped down as AMSAT-NA President and will become Chairman of the Board of Directors. Keith Baker, KB1SF, was elected President; Robin Haughton, VE3FRH, Executive Vice President; Stan Wood, WA4NFY, Vice President-Engineering; Keith Pugh, W5IU, Vice President-Operations; Martha Saganovitz, Corporate Secretary; and Art Feller, W4ART, Treasurer.

The Board also selected San Diego, California as the venue for the 17th AMSAT Annual Meeting and Space Symposium, to be held next October.

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make it even harder. If we are to combine question pools, then let us combine Advanced and Extra for more dedicated hams. New hams are the lifeblood and future of our hobby.

While Morse code requirements may have once been legitimate, they are no longer so. ...Morse code requirements are worse than antiquated. They are counter productive to reaching a generation raised on the Internet and with computers. Until the next ITU convention, the only Morse code test should be five words per minute. [Ed Griffith, KC6WCT]

■ I have been a ham since the early days 1950's and have the Advanced ticket. I have a degree in physics from Clemson University and worked for 35 years in the nation's nuclear weapons program. In 45 years, I have made possibly a half dozen CW contacts. I have viewed the code requirements as a way to keep persons out of ham radio. This was not so serious for the hobby until PCs, e-mail and cell phones became available. These new ways of communicating which do not require some arduous/meaningless testing to get a license, provide an attractive alternative to ham radio.

The result is that the number of new hams is in a serious decline. What I hear is that young folks do not want to spend a lot of time on code they never expect to use.

All portions of the HF and MF bands should be available for voice/SSB communication.

As for code, since speed has no relevance for science and technology and the sending and receiving of dots and dashes is an amusing antique method of communicating last used with the Titanic, the code test of the future could be to write from memory all 26 Morse code characters for the letters of the alphabet plus the period and question mark, and get 80% right. The design of the licensing process should be to reward technical achievement, not code proficiency.

The code fanatics in the ARRL should not be allowed to use code speed to 'protect band privileges.' They are a vanishing breed and when their influence has waned, the hobby will be better for it. Like cat whiskers for crystal radios, CW should be buried along with other historic relics of ham radio. [Tommy F. McCraw, K3KGF]

■ Entry level telegraphy speeds should be 5 WPM and the only other speed should be 13 WPM. The entry-level speed would be required for the entry level HF privileges which would be the new General Class. The higher speed would be required for the Advanced and Extra class. The distinction between Advanced and Extra would be in the written theory exam. ...To compensate for reductions in the Morse requirements, there needs to be corresponding increases in the written examination difficulty at all levels. [Ronald KB5MW and Jacqueline N5EWN Bouvier]

■ Since there has been a general reduction in the usage of Morse code in the world, and other digital modes have replaced Morse code; it would benefit all to reduce that same need in the Amateur Service. ...Another would be the elimination of theory that is not really relevant to the Amateur Service. ...Remember, this is a hobby and not a commercial endeavor. [Charles E. Blanchard, KA9OPR]

■ I agree that there are currently too many license classes in the Amateur Service, and that four classes is the correct

number to settle on in the future. I prefer to maintain the names of the four license classes as "Technician", "General", "Advanced" and "Extra."

I feel that telegraphy should not be removed as a requirement for access to the full privileges of the Amateur Service. Of the many proposals I have heard, I feel the one presented by the ARRL is best. Its 5 and 12 word per minute requirements are adequate. In line with the decrease in telegraphy exam difficulty, I feel that there must be an increase in difficulty in the written examinations. Today, the written exam is nothing more than an exercise in memorization. [Brian Westphal, K8MIO]

■ The license structure should be reduced from six to three classes: Technician, General and Advanced. There is no logical or technical need for three grades of HF licenses. The current Advanced and Amateur Extra Classes should be combined into a single class of license ...possibly with a new license name. Present HF spectrum allocated solely to the current Amateur Extra Class is grossly underutilized.

I urge the Commission to grandfather all current Technician Plus licensees to the General Class. Code requirements for [the advanced HF license class] should be in the 10-15 WPM range. The introductory HF license, proposed to be the General Class, should be lowered to the 5-7 WPM range.

If Morse code proficiency is deleted or significantly reduced, there should be a corresponding reduction in the sub-bands set aside for code operation.... [John D. Brewer, Round Rock, TX]

■ I am a high speed code operator who cut his teeth on Morse in the Navy and I presently communicate as a Amateur primarily in CW. I also believe this should be a choice and not a requirement for everyone. Modify the code requirement to be none for "Entry", 5 WPM for General, 10 WPM for Advanced and 16 WPM for Extra Class. [Written examination] questions should be more on communications knowledge and less on theory containing involved math questions. [Joseph J. Cwiklinski, N2QZQ]

■ I believe it is a severe imposition on amateur radio operators to reduce the licensing requirements for newcomers, only to swell the amateur ranks... Yet something has to be implemented to encourage the younger generation in this avocation, less it falter. ...The sorry mess that developed when the FCC abandoned the licensing of Citizen Banders must be avoided and I would despise the thought of that happening to Amateur Radio. ...Our youth are taking to the World Wide Web rather than studying the code. ...The problem is of tremendous proportions and I do hope that the FCC will solve the riddle and come up with answers that will encourage an increase in the number of radio amateurs who will be a credit to our country and not the type who will intentionally cause unwanted noise and harmonics that are a hindrance to the rest of us. [Harlan H. Benoy, KO6WF]

■ I think that Morse code proficiency is an antiquated and outdated requirement for the licensing of amateur radio operators of any class. It is no longer objectively necessary for any purpose. Its only function is to keep people out of amateur radio.

I also think the test requirements for the licensing of amateurs in the Technician and General Class are too strict. Amateur radio operators should be tested on what is actually necessary to know, such as FCC rules, good operating practices, and so on. The present testing practices were initiated when many amateurs actually built their own radios and almost nobody

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does that anymore. Electronics expertise of the level in the present tests is not necessary. *[Laird Wilcox, KB0RDL]*

■ Have two classes that operators can be licensed in. Have a General Class and an Advanced Class. The theory test I had to take could have been passed by a smart six-year-old child. People who have a General Class license, in my plan, would know an awesome amount about what goes on behind their control panel. People who hold an Advanced Class should know even more, and prove it on a test after holding a General Class [license] for three years. Some will not pass a difficult radio-theory test the first time, and maybe not the second time. But it will keep Amateur Radio from becoming CB radio. As for the code, many smart people don't have the time to learn a new language. At one time in Amateur history it was necessary — now it should just be an option — at whatever speed. *[Joe Gambino, N2UYY]*

■ I favor three levels of CW exam: 5, 12 and 20/25 WPM. The 5 WPM will help secure an influx of new operators in the HF portions of the Amateur Service. 12 WPM (instead of 13 WPM) will bring the Advanced Class into alignment with the Europeans under CEPT. A 25 WPM plain language, 20 WPM coded groups requirement using the existing First Class Radio-telegraph license code elements would give status to the Extra Class license that it now sorely lacks. At some future point, the code requirements for this license class should be increased to 30/25 WPM or greater. I favor a test of 1-minute solid copy out of 5 minutes. Only use multiple choice or fill-in blanks on accommodated exams for persons with disabilities. *[Warren T. Reese, WB6TMY]*

■ The codeless Technician Class is now the dominant class, with numbers approaching 50% of all amateur radio operators. ...It has become apparent that the World Radiocommunications Conference (WRC) scheduled for 2001, will move to eliminate the amateur telegraphy requirement contained in the international Radio Regulations.

The future of Amateur Radio in the United States depends upon attracting youngsters who have grown up using computers. How do we rationalize requiring these youngsters to memorize a 19<sup>th</sup> century code as we enter the 21<sup>st</sup> century? It is imperative that the FCC remove the "barrier" of an outdated telegraphy requirement from its Rules and Regulations.

It is my proposal that the FCC move to first reduce the telegraphy requirement to knowledge of the Morse code for all license classes. Since the international regulations do not specify any speed for knowledge of the Morse code, speed should be set to zero. Secondly, the FCC should move to eliminate the telegraphy requirement from FCC Rules and Regulations when the WRC acts to remove the telegraphy requirement from international regulations. *[Don Delarnette, KC4YRT]*

■ As a Extra Class ham operator, I oppose the new proposal that would reduce the code speed for all license classes in our hobby. I am concerned that the "dumbing down" of our hobby will attract people that are not committed and amateur radio will end [up] a "useless wasteland" like CB radio became. I am not opposed to the restructuring of licenses as long as the code speed is not reduced for access to the HF ham bands. I had to work very hard to achieve the 20 WPM. Why are we concerned about our hobby "dwindling"? Perhaps, we are responding to the concerns of radio manufacturers who would like to see more sales. *[Fernando Ares, KE9LE]*

■ I agree that the current license system is too complicated and can be narrowed to four classes without undue effort. The Novice license is sadly not needed any longer, and the two-level Technician Class can most certainly be eliminated and simplified. I would encourage you to allow only Class "A" (Extra Class) license holders to act as volunteer examiners.

I disagree strongly with the plan to privatize the enforcement of amateur radio. As society deteriorates, and the barriers lowered for entry into amateur radio, civility is becoming a forgotten concept on our bands. ...filthy language and bad operating practices are now common on our bands. These offending operators are not afraid of the law because there is no longer any effective enforcement of Part 97.

I would support the institution of an annual license fee of up to \$200 for each amateur operator, if this money would go directly to a unit within the FCC whose only objective would be to police the bands, track and to confiscate the equipment of offensive operators. It is a noble objective to have amateur radio operators police their own bands in a volunteer system, but this has never, and indeed, will never work. *[John Roberts, WA4JRR]*

■ I spend about 90% of my operating time on CW. ...I look at CW as an accepted international language, not a dinosaur. Let us look toward the future of the hobby, but preserve this art, or language, of communication. The HF band entry level (proposed "General") should be 5 WPM to invite new hams to the world of HF. From that point, we must keep the discipline and high operating standards: 10 WPM for Advanced and 20 WPM for Extra Class. *[Marty Szumera, WM2DX]*

■ I would enhance the proposals of the FCC and ARRL in the following ways: Class "A" (former Extra and Advanced license), Class "B" (Former General and Technician Plus) and Class "C" (Former Technician Class.) Current Novice license holders may upgrade to Class "B" license with appropriate written test. Morse code requirement for HF operation (10 through 160 meters) at one speed, a minimum of 5 WPM. ...it is irrational to restrict the growth of this hobby by limiting the use of valuable spectrum to CW and by restricting the freedom of communication between HF amateur radio operators. ...I propose that the phone sections of the 15, 20, 40 and 75/80 meter bands be greatly expanded to reduce signal interference and permit growth in the hobby. *[Jon W. Banning, Ph.D, N8PES]*

■ A strong and vital Amateur Radio Service is an important asset to the nation, fulfilling not only the well-known functions outlined in its regulatory charter, but also increasingly-important educational functions for a society growing more technological by the year. To do this, the service must grow and overcome an alarming trend toward stagnation evident in recent years.

That stagnation, evidenced by an increasingly "bottom heavy" distribution of licenses, is due in large part to the current licensing structure, and particularly to the significant barrier presented by the 13 WPM code requirement. The 13 WPM requirement is one of Morse proficiency, gained at the expense of an extensive investment of time, as opposed to more familiarity with Morse at 5 WPM, which requires significantly less work to attain. To provide a larger number of amateurs with operating privileges more likely to sustain their interest and long-term commitment, we must reduce the number of license classes and review the requirements for obtaining licenses. *[David G. Finley, N1IRZ]*

■ Morse code(CW) transmission remains an important part

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of HF and Amateur Radio Service operations. CW emissions require less bandwidth than most other transmission methods, and can be received from greater distances. Distance contesting, a popular Amateur activity makes extensive use of CW emissions. For long distance transmissions, CW may be unparalleled.

Assuming that Morse code competency is to be used, in part, to determine access to the HF bands, there should be a graduated means of entry. [I recommend that we] ...retain the current levels of required Morse code proficiency. [Frederick E. Patton, San Jose, CA]

■ I agree that the present requirements for Morse code proficiency should be reduced and that a more rigorous electronics exam take its place. The United States would certainly benefit from more ham operators having an improved electronics knowledge. But how does the present requirement of code proficiency benefit anyone except those who want the HF ham bands all to themselves? Please change these regulations! [Charles Kitchin, N1TEV]

■ While radiotelegraphy using Morse code remains a very viable and active mode within the Amateur service, technological advancements now offer many alternative modes of radio communication which are far superior in terms of quick and efficient transfer of information via electromagnetic propagation.

As an Extra Class licensee whose preferred mode of operation is CW, I personally would like to see the Morse code mandate eliminated and Morse code offered as an endorsement to all license levels. ...The 5, 13 and 20 WPM endorsement levels of skill would ...reward the operator with increased spectrum in the CW portion of the amateur bands.... I would like to see the bottom 150 kHz of each Amateur HF band devoted exclusively to CW use, with each progressive CW endorsement adding an additional 25 kHz of spectrum privilege to the licensee. [Thomas P. Johnson, KQ6DV]

■ In my view, the FCC's proposal does not go far enough toward streamlining and modernizing amateur radio licensing. The proposed four classes of license are simply still too many. I favor the elimination the following classes: Novice, Tech plus, and Advanced, while retaining the Technician, General and Extra. Current Novices and Technician Plus licensees should be 'grandfathered' into the General Class. Current Advanced class licensees should be 'grandfathered' into the Extra Class.

Today, Morse code is merely one of the many modes of communication used by amateur radio operators. There is no reason to single it out as particularly significant or important. A single 5 WPM Morse test will also remove the necessity of processing and issuing waivers of high-speed code tests for the handicapped. Eventually, all Morse testing should be eliminated consistent with our obligations under international treaties. [James L. Kelly, KK3KJ]

■ Contrary to much of the current rhetoric, telegraphy continues to be a very popular mode of communications among radio amateurs. ...The Extra Class sub-bands are highly valued by amateurs involved in long distance "DX" communications. ...Since access to these telegraphy sub-bands is the primary benefit of upgrading to Extra Class, and since examination requirements should correlate to privileges earned, it is appropriate that the Extra Class code test be very challenging.

Therefore, I strongly urge the Commission to keep the 20 WPM Extra Class code requirement. ...I suggest that the Commission reduce the code requirement for the General and Ad-

vanced Class to 10 WPM. [Arthur P. Harris, N2AH]

■ I likely would continue to support the Morse requirement even if in 2001 WRC decided to delete this requirement. However, I do not support a proficiency that eliminates or keeps out those who cannot provide increased code speed. ...If 5 WPM fulfills the requirement of the international Radio Regulations, Article S25, then why not leave the speed at 5 WPM? As the regulations state, there is only the need to, "send correctly by hand ...and receive by ear." [William H. Skinner, WA2ILF]

■ I have no quarrel with those that believe some CW skill is needed. However, I also believe that as a hobby, amateur radio should only require sufficient knowledge of rules and regulations, technical skill and operational competency to assure compliance... Just being a skilled CW operator does not of itself assure the other. ...The need to demonstrate [cw proficiency] is long past. The level of competency should be no more than basic, and that too is questionable. ...Let's face facts, most of the so called "no-code Techs" are as knowledgeable of state-of-the-art operating modes and techniques (or in many cases, more knowledgeable) than many "old timers" with great CW skills. Why should a hobby be so restricted that we exclude them? [Frederick K. Walters, Jr., WB5CBD]

■ I do not support the ARRL position whereby operators who have passed the 5 WPM code test should be given full HF operating privileges. I would not oppose lowering the entry level speed to as low as 10 WPM, but no lower unless the Commission can determine some other method of demonstrating commitment to gain worldwide HF privileges. ...There are many amateurs who do not belong to the ARRL, and the ARRL does not necessarily speak for the amateur community at large. [K. Alan Robbins, KB8VCK]

■ I have concluded that the single greatest obstacle to continued participation in HF Amateur Radio is the 13 word-per-minute General Class CW exam, Element 1B. Many thousands of otherwise qualified Technician Plus operators have demonstrated an interest in HF voice and data communications, but in reality, few have a desire to use Morse code telegraphy. Forcing this group to attain such a high, 13 WPM level of proficiency in CW is unreasonable and dispiriting. Therefore I believe the entry level Morse proficiency required for meaningful HF voice privileges should be lowered to 5 WPM. [Michael Borowiec, N9EUZ]

■ The General Class code test speed should be reduced to 5 WPM and the Extra Class should be reduced to 13 WPM. I am of the opinion that eventually, due to changes in technology that the CW requirement should be eliminated entirely. [Gene Gentino, KG7NJ]

■ In today's world of digital communications technology, can anyone make a serious argument that we must have some mythical pool of code trained operators for civil order or national security? Why then should a hobby, albeit a hobby that enjoys the privilege of using the airways, be so restrictive that it actually discourages many persons from venturing into it?

I am a teacher of technology at a middle school... Students struggle to master the 5 WPM level of skill and then fast become discouraged when they realize how restricted their Novice and Technician license is.

Those "old timers" who have successfully reached the General or Advanced level may defend the need for code by

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arguing, "I had to pass through those gates to get to the privileges I now enjoy, so let others do it," are in effect saying, "Let this be a hobby of elitists." [Roger Eldon Hammond, KB9IHP]

■ Most hams who wish to keep the Morse code do so because they had to or it is a "rite of passage" that will keep the riff-raff off the ham spectrum. I wish this were true but one needs to listen on any given night to know that we have plenty of undesirables already licensed, many as Extra Class licensees. Morse code is antiquated [and] no longer used or required by the agencies for which hams previously provided support ...specifically the US military and maritime services.

Most hams learn Morse code only to lose the skill and knowledge. If you require Morse code, then require a competency exam with every renewal. As a physician, I am required to demonstrate continued competency. If Morse code is so important to Amateur Radio, then we should be required to show continuing proficiency or lose our privileges. ...I can reasonably assure you that most licensees cannot perform Morse code at their current license requirement. ...If Morse code is to remain, five (5) words per minute should be the requirement.

Speaking as a physician, certain handicaps do prevent proper discernment of skills acquired by hearing. These are few in number and should require proper documentation. A federal employee or officer should be required to review these requests, not the VEC. This policy will avoid favoritism, reduce the chance of loss of medical record confidentiality and make the procedure just onerous enough to deter most of those who would abuse it. [Gary R. Oakes, M.D., WD4ICJ]

■ I feel that 20 WPM should continue to be asked of those seeking the Extra Class license. This license has always represented something special in the amateur community. And until telegraphy loses its large international constituency of devotees and has ceased to be a requirement in international law (a time that has not yet come), this is one of the ways that the integrity, and meaning of this special license can be preserved. [Steven J. Meyers, W0AZ]

■ I see no reason to do away with Morse proficiency requirements. Admittedly there is less justification for this today. Nevertheless, it is a valid testing standard. We are tested on many other modes of communication, most of which many of us will never use. ...The matter of Morse code waivers for certain disabled people is difficult. I would rather see an occasional person slip through than make the process overly difficult for the people who truly need a waiver. [Robert E. Nelson, N5EW]

■ I disagree with the ARRL's newest proposal to allow Technician operators (without any Morse code credit) to be allowed access to the HF bands below 30 MHz. Assuming the proposal is accepted, these operators may not have studied nor have been tested on HF operating practices. Plus, it would be onerous on the Amateur Auxiliary to determine who does or does not have HF privileges.... [George Tranos, N2GA]

**[Editor's Note: The Courage Handi-Hams System is a large Minnesota-based organization whose membership is composed of disabled and/or handicapped amateurs. Their comments are especially significant since the ARRL has petitioned the FCC to tighten up high speed code waivers. Here is what CHHS has to say.]**

■ The disability waiver should be eliminated, while provisions must be in place to adapt the remaining slow code testing for people with severe disabilities. These changes will result in a benefit to most people with disabilities in that they will not be forced to incur the extra time and expense associated with a doctor visit as part of a license application, and they will be spared the embarrassment of trying to take an "adapted" fast code exam before a group of volunteer examiners who have no medical experience or knowledge of adaptive methodology. A benefit accrues to the Commission which is relieved of the oversight and enforcement duties associated with the Disability Waiver. The Amateur Service benefits, because testing would more closely parallel "real world" requirements. Morse is no longer used in any other HF service. ...

The waiver is a necessity for persons whose disabilities truly prevent them from using fast code, but the entire question of the waiver needs to be examined in the context of communications for the Twenty-First Century; to wit: Is code proficiency a necessary and elemental skill for communicating on the high frequency bands.

The Amateur Service stands alone as a user of Morse Code in regular worldwide high frequency band communications. Virtually every other service has moved on to digital modes or voice communications. We view this as a far more reliable indicator of code's true utility than the arguments about code "getting through when other media cannot." Our assessment of the situation in 1998 is that while code is fun to use and retains a following in the amateur community, it is no longer essential to HF communications, adding little to the overall reliability of data transfer and nothing to an advance in the state of the art of HF communications. ...we must conclude that code testing should be phased out of the Amateur Service as irrelevant to real-world HF communications practice. ...

As it stands now, FCC rules mandate fast code testing for General and Extra Class licenses. Our feeling is that, should a person with a disability challenge the requirement as irrelevant and arbitrary in light of the movement of all other HF services away from code, it would be impossible to defend fast code testing and the requirement would be vacated. In other areas of society, irrelevant testing material and procedures have been stricken down as illegal time and time again.

We should also point out that an adapted testing procedure is not always an apt substitute for people whose disabilities include hearing loss and limited motor control. The truth is that even if these applicants pass an adapted test most will never actually use the code, yet they are being forced to comply with a procedure that would not even exist if testing in the Amateur Service tracked real-world skills. Furthermore, some of these folks cannot even pass the 5 word per minute test without heavy "adaptation", opening the door for charges of preferential treatment, abuse of the adaptive testing process, and sneering put-downs about "no-code Extra class licensees" when such persons move through the licensing levels, either with the waiver or through heavily adapted code testing.

We believe that VE teams are not in a position to adapt tests to every disability, nor should they have to. They are not physiologists or audiologists and cannot be expected to understand adaptive methodology. Adaptive procedures in other areas of endeavor follow careful, individualized assessment. It is absurd to expect amateur radio volunteers to do this job with no training and no set procedures.

[Patrick Tice, WA0TDA, Manager, Courage HAM System]